

OAO91 (Rev. 12/03) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

AUG 28 2014

Southern DISTRICT OF Texas

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

Belinda Solis
YOB: 1975
U.S. Citizen

CRIMINAL COMPLAINT

Case Number: M-14-1683-M-01

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about November 6, 2012 in Hidalgo County, in the Southern District of Texas defendant(s) did,

Offense Description

Whoever knowingly or willfully gives false information as to his name, address or period of residence in the voting district for the purpose of establishing his eligibility to register or vote, or conspires with another individual for the purpose of encouraging his false registration to vote or illegal voting, or pays or offers to pay or accepts payment either for registration to vote or for voting in Federal election shall be fined not more than \$10,000 or imprisoned not more than five years, or both.

in violation of Title 42 United States Code, Section(s) 1973i(c).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

Official Title

Please see attached Affidavit.

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ NoApproved by: Leo J. Leo III
AUSA

Signature of Complainant

Brandon Cook, Special Agent, FBI

Printed Name of Complainant

Sworn to before me and signed in my presence,

August 28, 2014 at 4:46 pm

Date

McAllen,

Texas

City

State

Peter E. Ormsby

Name of Judge

U.S. Magistrate Judge

Title of Judge

Signature of Judge

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Brandon Cook, being duly sworn, hereby depose and state:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), and have been so employed since July 2010. I am currently assigned to work public corruption to include election crimes investigations within the San Antonio, Texas Division.
2. Since joining the FBI, I have received law enforcement training in the investigation of criminal violations of federal law within the jurisdiction of the FBI, and have received specialized training and gained experience in arrest procedures, search warrant applications, the execution of search and seizures, and various other criminal laws and procedures.
3. I make this affidavit in support of the issuance of a complaint and arrest warrant for subject Belinda Solis Garza (Solis).
4. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, and on my own experience and training as a Special Agent of the FBI. Because the affidavit is being submitted for the limited purpose of securing a complaint, I have not included each and every fact known to me concerning the investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe Solis violated 42 U.S.C. § 1973i(c).
5. Based upon this information gathered during the course of this investigation, including some of the information set forth below, it is believed that Solis worked as a *politiquera* during the 2012 Primary Election and November 2012 General Election. Federal candidates were on the ballot for these elections. Based upon my knowledge and experience, a *politiquera* is a person who works for a candidate to encourage people to vote, to bring voters to the polls, to ensure that voters select the appropriate candidate, to pay voters for their votes.
6. The FBI has interviewed various individuals regarding the defendant's vote-buying activities in the 2012 primary and general elections. On February 26, 2013, FBI agents interviewed another *politiquero*, Campaign Worker 1, who stated that he worked for a Hidalgo County Commissioner in the 2012 Primary Election. Campaign Worker 1 said he bought an eight ball (\$50 worth of cocaine), split it up, and gave it to two *politiqueras*, including Solis, to give to voters to vote for the Hidalgo County Commissioner.
7. On March 15, 2013, FBI agents interviewed Solis. Solis said that on two separate occasions during the 2012 General Election, Campaign Worker 1 gave Solis a clear plastic bag with twenty dollars worth of cocaine in it to give to voters to vote for Donna School Board candidates. Further, Solis advised that Campaign Worker 1 gave Solis forty dollars with the instruction to pay each voter ten dollars to vote for the Donna School Board candidates.
8. Solis advised that she did use that money to pay four voters to vote. Specifically, Solis paid three people ten dollars in exchange for their vote and paid her ex-husband five dollars in

exchange for his vote. During a later interview, Solis recalled paying another voter a dime bag of cocaine in exchange for his vote in the 2012 General Election.

9. On May 2, 2013, FBI agents interviewed Voter 1. Voter 1 advised that a female *politiquera*, First Name Unknown (FNU) Last Name Unknown (LNU) of medium build and in her 30's went to Voter 1's house and asked Voter 1 to vote. FNU LNU paid Voter 1 ten dollars to vote for the Donna School Board candidates in the 2012 General Election. While Voter 1 never identified FNU LNU, Solis admitted to paying Voter 1 and Voter 1's brother ten dollars each to vote for the Donna School Board candidates in the 2012 General Election.
10. On January 15, 2014, FBI agents again interviewed Solis. Solis advised that she was a *politiquera* during the 2012 Primary Election and recalled that a campaign manager gave ziplock bags containing dime bags of cocaine to *politiqueras* Solis and another *politiquera* to give to voters in exchange for their votes.
11. On March 11, 2014, FBI agents interviewed Voter 2. Voter 2 advised that Solis paid her money for Voter 2's vote in both the 2012 primary and general elections. For one of those elections, Voter 2 advised that Solis picked up Voter 2 from Voter 2's home and took Voter 2 to vote. Solis then served as Voter 2's voting assistant and told Voter 2 who to vote for. After voting, Solis drove Voter 2 to where Voter 2 worked, and Solis then paid Voter 2 ten dollars for voting for the candidates Solis supported.
12. On August 15, 2014, FBI agents interviewed Solis at her home to corroborate the information Solis previously provided. Solis advised that the information previously reported to the FBI was accurate: Solis was a *politiquera* during the 2012 General Election and received both cocaine and cash from Campaign Worker 1 during the 2012 General Election to pay to voters in exchange for their vote. Solis specifically recalled receiving forty dollars from Campaign Worker 1 with the instruction to use the money to pay voters to vote for Donna School Board candidates. Solis then used that money to pay four voters ten dollars each to vote for the Donna School Board candidates.